

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECTOR RESOURCES LTD,

Petitioner,

v.

ETHOS ASSET MANAGEMENT, INC. *and* EAST
WEST BANCOPRP INC. a/k/a EAST WEST
BANK,

Respondents.

Case No. 23 Civ. 09728 (ER)

**DECLARATION OF ROBIN NUNN IN SUPPORT OF RESPONDENT
ETHOS ASSET MANAGEMENT, INC.'S OPPOSITION TO
PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Robin Nunn, being duly sworn deposes and says:

1. I am over eighteen years of age and I am admitted to the practice of law in New York and Washington, D.C. I have personal knowledge of the facts set forth below.
2. I am counsel to Respondent Ethos Asset Management, Inc. ("Ethos").
3. Exhibit A is a true and correct copy of the transcript of the hearing before this Court on November 6, 2023, held pursuant to the Court's November 3 Order, *see* ECF No. 9, regarding Petitioner's request for a temporary order.
4. Exhibit B is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated August 4-10, 2023.
5. Exhibit C is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated September 12-25, 2023.
6. Exhibit D is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated September August 10-11, 2023.

7. Exhibit E is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated September 9-12, 2023.

8. Exhibit F is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated September 1-8, 2023.

9. Exhibit G is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated August 28-September 5, 2023.

10. Exhibit H is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated August 16, 2023.

11. Exhibit I is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated August 17, 2023.

12. Exhibit J is a true and correct copy of a screen shot of a text message exchange between Carlos Santos and William Dell'Orfano dated August 17-28, 2023.

13. Exhibit K is a true and correct copy of Ethos Asset Management's Balance Sheet for the period January 1-September 30, 2023.

14. Exhibit L is a true and correct copy of an "Agreement for Professional Services relating to US Immigration Matters," between Carlos Santos and David F. Gencarelli, dated November 3, 2023.

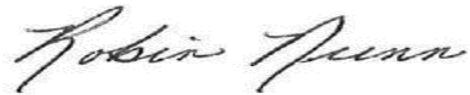
15. Exhibit M is a true and correct copy of Ethos Asset Management's "Investment Portfolio."

16. Exhibit N is a true and correct copy of an email exchange between Carlos Santos and William Dell'Orfano dated May 6, 2023.

17. Exhibit O is a true and correct copy of Ethos Asset Management's "Project financing – Investment Strategy and Policy."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 9, 2023



Robin Nunn